



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MPR:BCR
F. #2009R01065

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 16, 2021

By ECF

The Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Joaquin Archivaldo Guzman Loera
Criminal Docket No. 09-466 (S-4) (BMC)

Dear Judge Cogan:

In the course of preparing the appeal in the above-captioned case, the government has had occasion to review sealed portions of trial transcripts and determined that, in two instances, the reasons originally justifying sealing are no longer applicable. Accordingly, the government respectfully moves that the Court unseal the following pages of trial transcripts:

- Pages 3407-3410 (December 18, 2018)
- Pages 6935-6962 (February 4, 2019)

Both of these sealed parts of the trial record concern the Court's interactions with members of the jury. However, unsealing these portions will not identify members of the jury nor risk revealing details of any of the precautions taken to ensure the jury's anonymity

and privacy. The government has consulted with counsel for the defendant, and the defendant does not object to unsealing these portions of the trial transcript.

Respectfully submitted,

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cc: Clerk of Court (BMC) (via ECF)
Defense Counsel (via Email)